

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

NOIRE TURTON, <i>et al.</i>	)	
Plaintiffs,	)	
	)	
v.	)	Civil No. 3:14cv446 (REP)
	)	
VIRGINIA DEPARTMENT OF	)	
EDUCATION, <i>et al.</i> ,	)	
Defendants.	)	
_____	)	

**JOINT RECOMMENDATION REGARDING SANCTIONS**

The parties come before the Court by Order (ECF No. 77) regarding the fashioning of appropriate sanctions. On January 16, 2015, the Honorable Robert E. Payne, Senior United States District Judge, granted Defendant Patrick T. Andriano's Motion for Sanctions. (ECF Nos. 73, 74.) On June 1, 2015, Defendant Patrick T. Andriano and counsel for Plaintiffs, Charlotte P. Hodges and Nnika E. White, with the assistance of the Honorable David J. Novak, United States Magistrate Judge, reached the following recommendation regarding appropriate sanctions in this matter.

The parties recommend that Ms. Hodges pay a total of Five Thousand Dollars and Zero Cents (\$5,000.00) to Mr. Andriano as follows. Ms. Hodges shall pay One Thousand Dollars and Zero Cents (\$1,000.00) not later than July 1, 2015. Beginning August 1, 2015, Ms. Hodges shall pay Two Hundred Dollars (\$200.00) and Zero Cents for twenty (20) months.

The parties recommend that Ms. White pay a total of Two Thousand Dollars and Zero Cents (\$2,000.00) to Mr. Andriano as follows. Beginning July 1, 2015, Ms. White shall pay One Hundred Dollars and Zero Cents (\$100.00) for twenty (20) months. Ms. White shall have the option to prepay any remaining balance owed, without any prepayment penalty.

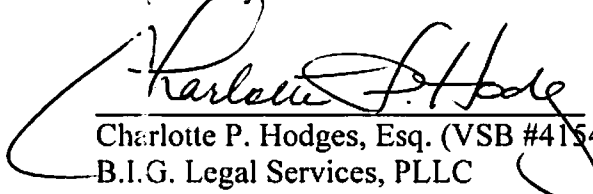
Ms. Hodges and Ms. White shall have a five (5) day grace period in which to make each of the specified payments. Failure to pay before expiration of the grace period shall be a breach of the

agreement. The Court will retain jurisdiction of this matter for purposes of the enforcement of this agreement, with the matter referred to Judge Novak for any further proceedings.

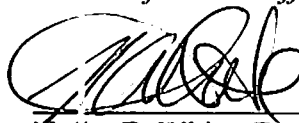
Mr. Andriano agrees to donate the received funds to the Virginia Bar Foundation.

Finally, the parties recommend that each Ms. Hodges and Ms. White shall issue to Mr. Andriano a letter of apology within ten (10) days of the filing of this recommendation.

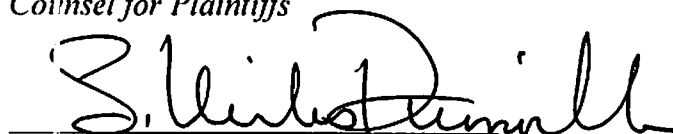
Respectfully submitted:



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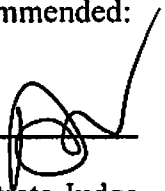
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Negotiated and recommended:

\_\_\_\_\_/s/   
David J. Novak  
United States Magistrate Judge

Richmond, Virginia

Date: June 1, 2015

**CERTIFICATE OF SERVICE**

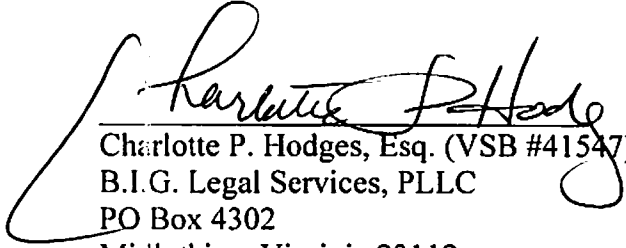
I hereby certify that on the 1st day of June, 2015, a true and correct copy of the foregoing was filed via the Court's CM/ECF system, which will send notice to all registered users, including the following:

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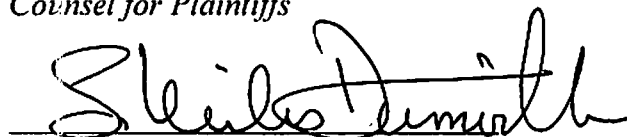
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